SARA Title III Section 313
Inspection Log Sheet

Report #: **09-313U-002**

Facility: **Chase Manufacturing Company**

Location: **9 Pennsylvania Avenue**
Corry, Pennsylvania 16407

Date of Inspection: October 15, 2008

Report Completed: November 10, 2008

Preliminary Compliance Determination: No evidence of violations CGH 11/10/08

Date Referred To RC For Review/Concurrence: _____

Date Administrative Complaint signed: _____

Date NCN Issued: _____

Date Withdrawn: _____

Date Of Close-Out: _____

Comments: **The facility was friendly, prepared and cooperative.**

SARA TITLE III SECTION 313 INSPECTION REPORT
09-313U-002

I. ***Date of Inspection***: October 15, 2008

II. ***Facility:*** **Chase Manufacturing**
9 Pennsylvania Avenue
Corry, Pennsylvania 16407

III. ***Facility Description:*** The facility is located in a rural/residential area near schools. The grounds are mainly dirt with very little grass nearby. The buildings are of brick and metal siding and appear to be in good condition. A new addition was added 5 to 6 years ago made of metal and also appears to be in good condition. The walkthrough disclosed metal chips embedded in the floor. There was also metal waste on the floor. Housekeeping could be improved.

IV. ***SIC:*** 3469

NAICS: 332116

V ***Process:*** A description of the process is as follows: 1) Carbon steel rolls are brought into the production area. 2) The coils are run through a coil line where they are uncoiled and fed into a press. 3) The metal is then formed into a blank or bent in a die. 4) The blank is then tapped and /or formed in a press Brake. 5) The pieces are then welded or assembly welded. 6) The final product is then powder coated and/or boxed, palletized for shipment.

VI. ***EPA Inspector***:

Abraham Reich
Environmental Scientist/Inspector
Toxics Programs & Enforcement Branch (3WC33)
(215) 814-2157

VII. ***Company Officials***:

Richard P. Chase
President
814-664-9069

Byran Anderson
Vice President
814-664-9069

VIII. ***Purpose of Inspection***:

This inspection was conducted to inspect, document, and verify the facility's compliance with the reporting requirements stated in 40 C.F.R. Part 372 under Section 313 of SARA Title III.

IX. ***Sara Title III***:

A plant, factory, or other facility comes under the provisions of Section 313 if it meets all three of the following criteria;

1. The facility is included in Standard Industrial Classification (SIC) codes 10 (except 1011,1081, and 1094), 12 (except 1241), 20 to 39, 4911, 4931, 4939 (limited to facilities that combust coal and/or oil for the purpose of generating electricity for distribution in commerce), 4953 (limited to facilities regulated under the RCRA Subtitle C, 42 U.S.C. Section 6921 *et seq.*), 5169, 5171, and 7389 (limited to facilities primarily engaged in solvents recovery services on a contract or fee basis); and

2. It has 10 or more full-time employees (or the equivalent 20,000 hours per year). And

3. It manufactures (including imports), or processes, or otherwise uses a listed toxic chemical during any calendar year in amounts greater than the threshold quantities specified below.

Thresholds are specific amounts of toxic chemicals used during the calendar year that triggers reporting requirements.

1. If a listed toxic chemical is manufactured, imported or processed, the threshold quantity is 25,000 pounds per toxic chemical or category over the calendar year.

2. If a listed toxic chemical is otherwise used (without incorporating it into any product or producing it at the facility), the threshold quantity is 10,000 pounds per toxic chemical or category over the calendar year.

3. Starting with calendar year 2000, manufactured, processed , or "otherwise- use" thresholds of these additional chemicals also called Persistent Bioaccumulative Toxic Chemicals (PBT) are as follows;

100 pounds - aldrin, methoxychlor, pendimethalin, polycyclic aromatic compounds, tetrabromobisphenyl A, trifluralin;

10 pounds - chlordane, heptachlor, mercury, mercury compounds, toxaphene, isodrin, polychlorinated biphenyls, benzo(g,h,i)perylene, hexachlorobenzene, octachlorostyrene, pentachlorobenzene;

0.1 grams - dioxin and dioxin - like compounds.

4. Starting with calendar year 2001, manufactured, processed, or "otherwise- use" of the chemical lead in amounts greater than or equal to the amounts specified, a Form R is required:

100 pounds - lead which is not contained in stainless steel, brass, or bronze alloy.

100 pounds - lead compounds.

X. *Opening Conference*:

1. *Inspection Procedures and General Information*:

On October 15, 2008, a Section 313 inspection was conducted at Chase Manufacturing. On October 6, 2008, prior to the inspection, a letter was sent to the company confirming the date of the inspection and requesting the availability of documentation (attachment C2). The EPA inspector met with company representatives at 0813. The inspector's credentials were presented and a Notice of Inspection was presented and explained (Attachment A). Mr. Chase signed the notice and outlines of the areas to be investigated were discussed.

XI. *Summary*:

Section 313 was the primary focus of the inspection. The facility was telephoned on October 6, 2008, to determine if an inspection was warranted (attachment C1). A copy of the notice of inspection was sent to the Superfund Removal Branch to allow them the option to further investigate compliance with Sections 302, 311, and 312 at their discretion.

Mr. Anderson stated that the plant's primary SIC Code is 3469 and NAICS 332116. The remainder of the inspection involved determining if the plant manufactured, processed, or otherwise used any one of the listed toxic chemicals in excess of the threshold in calendar years 2005, 2006 and 2007.

The number of employees and sales for the year being examined are as follows:

	2005	**2006**	**2007**
Employees: (approximately)	32	32	32
Sales: (approximately)	3.5MM	3.9MM	3.6MM

For the inspection, they had compiled summaries of usages of Section 313 chemicals as shown in attachment C2. Section 313 chemicals are summarized as follows:

CAS Number	Chemical	Usage in Pounds 2005	2006	2007
7439-96-5	Manganese	6028	6711	4423

XII. ***Closing Conference*:**

Chemical usage records and Material Safety Data Sheets (MSDS) were requested by the EPA Inspector and the SARA Title III Section 313 investigation was concluded. Receipts for samples and documents were completed (attachment B) at the conclusion of all inspection activities.

XIII. ***Attachments*:**

A. Notice of Inspection
B. Receipts for Samples and Documents
C. **1.** Initial Telephone Call Record
2. Letter to Facility Confirming Date of Inspection
3. MSDS
4. Summary of Section 313 chemicals

XIV Summary of Findings:

Chase Manufacturing did not submit a Form R under Section 313 of SARA 6, and 2007. The records showed that the facility had greater than 10 employees (32, 32, and 32 respectively for the years being examined) and is a manufacturer (SIC Code 3469/NAICS 332116). In addition, the records showed that the facility **did not exceed the threshold** for the following listed Section 313 chemical:

Chemical	Reporting Year	Amount (Lbs.) Manufactured (M) Processed (P) Otherwise Used (O)		Form R Due
Manganese	2005	6028	(P)	N
	2006	6711	(P)	N
	2007	4423	(P)	N

NOTICE OF INSPECTION

U.S. ENVIRONMENTAL PROTECTION AGENCY

Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA)

1. INVESTIGATION IDENTIFICATION			2. TIME
DATE	INSPECTOR NO.	DAILY SEQ. NO.	
10-15-08	011		0813

4. INSPECTOR ADDRESS

U. S. EPA Region III
1650 Arch Street
Mail Code: 3WC33
Philadelphia, Pennsylvania 19103-2029

Chase Manufacturing

9 Pennsylvania Ave.
Corry, Pennsylvania 16407

REASON FOR INSPECTION: This inspection is for the purpose of determining compliance with the Emergency Planning and Community Right-to-Know Act of 1986, Section 313 toxic chemical release reporting requirements. The scope of this inspection may include, but is not limited to: reviewing and obtaining copies of documents and records; interviews and taking of statements; reviewing of chemical manufacturing, importing, processing, and/or use facilities, including waste handling and treatment operations; taking samples and photographs; and any other inspection activities necessary to determine compliance with the Act.

INSPECTOR SIGNATURE		RECIPIENT SIGNATURE	
Abraham Reich			
NAME		NAME	
Abraham Reich		Richard Chase	
TITLE	DATE SIGNED	TITLE	DATE SIGNED
Inspector/Technical Advisor	10-15-08	President	10-15-08

EPA FORM 3540-35 (8-93)
★U.S. GPO: 1993-342-137/80115

ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

EPA Superfund Amendments and Reauthorization Act — Title III
Emergency Planning and Community Right-to-Know Act of 1986

RECEIPT FOR SAMPLES AND DOCUMENTS

Form Approved.
OMB No. 2070-0007
Approval expires 3-31-88

1. INVESTIGATION IDENTIFICATION

DATE	INSPECTOR NO.	DAILY SEQ. NO.
10-15-08	011	

3. INSPECTOR ADDRESS

U. S. EPA Region III
1650 Arch Street
Mail Code: 3WC33
Philadelphia, Pennsylvania 19103-2029

Chase Manufacturing

9 Pennsylvania Ave.
Corry, Pennsylvania 16407

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Emergency Planning and Community Right-to-Know Act of 1986.

RECEIPT OF THE DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.	DESCRIPTION
001	Miami Valley Steel "Test of Steel Analysis"
002	MSDS of China
003	MSDS of Cold rolled Steel

Chemical identities for underlined items have been claimed as trade secret. The facility official requesting such treatment has read and understands EPCRA Section 322 and pertinent trade secret regulations and understands EPCRA Section 325 which provides for (among other things) penalties for frivolous claims.

INSPECTOR SIGNATURE		RECIPIENT SIGNATURE	
Abraham Reich		Bryan Anderson	
NAME		NAME	
Abraham Reich		Bryan Anderson	
TITLE	DATE SIGNED	TITLE	DATE SIGNED
Inspector/Technical Advisor	10-15-08	V.P.	10/15/08

EPA Form 7740-1 (12-82)

ATTACHMENT C

EPA Region III
Initial Telephone Call Record

Date of Call: 10-6-2008

Facility Name: Chase Manufacturing

Facility Address: 9 Pennsylvania Ave
Corry PA 16407-1603
PO Box 37 16407-0037

County: Erie

Phone Number: 814-664-9069

Facility Contact: Jan - Bryan Anderson

Inspector Making Call: A. Reich

SIC Code: 3469 **Emp.:** 40 **Fac. Size:** 47.5 **K ft square** **$** 3.1 MM

NAICS Code: 332116

Call: left msg 10/6 called 11-14

Send Info.: _____

1) Are you familiar with SARA Title III? Yes ____ No____
(If yes, move to question 2. If no, give a brief explanation).

2) Are you familiar with Section 313 of SARA Title III? Yes____ No____

3) Did you report under Section 313 for the 2005 Reporting Year? **Yes**____ **No** ✓

4) Did you report under Section 313 for the 2006 Reporting Year? **Yes**____ **No** ✓

5) Did You report under Section 313 for the 2007 Reporting Year? **Yes**____ **No** /

6) Business: metal stamping SIC 16. Section

7) No. of employees: 200__ (_____), 200__ (_____) 200__(____)

8) Do you use any chemicals at your facility? Yes _____ No _____

9) Do you use any Section 313 Chemicals? Yes _____ No _____
Section 313 chemicals Used: _____
_____
_____
_____

10) Did you determine if you are subject to Section 313 reporting? Yes _____ No _____

11) Did your facility report under Section 302 (Notification of SERC if an EHS is present on your site at quantities above TPQ's) and Section 303 (If subject to Section 392, notified LEPC of a selection of a facility representative). Yes _____ No _____

12) Did your facility report under Section 311 (Submission of MSDS's or a list of MSDS chemicals to SERC, LE PC, and local fire departments by 10.17/87 if applicable thresholds were exceeded). Yes _____ No _____

13) If your facility needed to comply with Section 311, did your facility submit the required Tier I or Tier II forms to the appropriate agencies for:

A) The 200__Reporting year by 03/01/9__? Yes _____ No _____

B) The 200__Reporting Year by 03/01/0__? Yes _____ No _____

C) The 200__Reporting Year by 03/01/0__? Yes_____ No_____

14) Did the phone call result in an inspection? Yes _____ No _____
If yes, Date:_____, and Time:_____

15) Comments:_____
_____
_____
_____
_____
_____
_____
_____

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

October 6,

Mr. Bryan Anderson
Chase Manufacturing
9 Pennsylvania Avenue
Corry, Pennsylvania 16407-1603

RE: Superfund Amendments and Reauthorization Act (SARA) Title III Section 313 Inspection

Dear Mr. Anderson:

This letter is to confirm that on October 15, 2008, at 8:30 a.m., the U.S. Environmental Protection Agency (EPA Region III will conduct an inspection of your facility. This inspection will be conducted pursuant to the Emergency Planning and Community Right-to-Know Act (EPCRA). EPA's primary focus during this inspection will be to gather information regarding compliance with Section 313 of EPCRA.

The inspection will be conducted by Mr. Abraham Reich. Mr. Reich is assisting the Environmental Protection Agency (EPA) under a cooperative agreement with the Senior Service America, Incorporated (SSAI) as part of the Senio Environmental Employment (SEE) Program. Part of the technical assistance that Mr. Reich provides to the EPA are inspection services under my direction and monitoring pursuant to EPCRA, SARA Title III. As a SEE enrollee, Mr. Reic is authorized by EPA to have access to Confidential Business information (CBI), and has signed a Non-Disclosure agreement regarding such information.

To save time during the inspection, please have available for review and collection by the inspector copies of the following documents for the **2005, 2006** and **2007** calendar years:

a. Names and Chemical Abstract Service (CAS) numbers of all EPCRA Section 313 chemicals used, numb of employees, and sales for the years specified above;

b. Annual usage summaries (pounds) of each EPCRA Section 313 chemical with supporting documentation for each year indicated above (supporting documentation should include such items as beginning and end year inventory, purchase records, and if applicable, import records);

c. Chemical production records for all Section 313 chemicals or chemical categories manufactured, process or otherwise used at your facility.

Note: If your facility manufactures, processes, or otherwise uses mixtures which contain Section 313 chemicals, please provide for each of these mixtures a copy of the Material Safety Data Sheet (MSDS), or other written notification which specifies the chemical composition of the mixture.

In addition to the above items, **please provide a brief summary of your manufacturing process** and notify Mr. Reich of any safety equipment (e.g. eye or ear protection, safety shoes, hard hat, etc.) he should bring with him to the inspection. If time permits, he will tour your plant. Should you have any questions, please call Mr. Reich at (215) 814-2157.

Sincerely,

Craig E. Yussen
EPCRA Section 313 Compliance Coordinator
EPA Region III

Attachment: EPCRA Fact Sheet
cc w/o Attachments: Section 313 State contact
EPA: Michelle Price-Faye (3HS61)

LINCOLN ELECTRIC

FEB. 1992

Trade Name: Lincolnweld L-56
Sizes: All

MATERIAL SAFETY DATA SHEET

For U.S. Manufactured Welding Consumables and Related Produc

Conforms to Hazard Communication Standard 29CFR 1910.1200 Rev. October, 1988

SECTION I - IDENTIFICATION

Manufacturer/ Supplier: The Lincoln Electric Company 22801 St. Clair Avenue Cleveland, OH 44117-1199 (216) 481-8100	Product Type: Carbon steel electrode Classification: ER70S-6 EH11K (EG)

SECTION II - HAZARDOUS MATERIALS (1)

IMPORTANT!

This section covers the materials from which this product is manufactured. The fumes and gases produced during weldi with the normal use of this product are covered by Section V; see it for industrial hygiene information.
CAS Number shown is representative for the ingredients listed.

(1) The term 'hazardous' in 'Hazardous Materials' should be interpreted as a term required and defined in the Hazards Communication Standard and does not necessarily imply the existence of any hazard.

Ingredients:	CAS No.	Wt.%	TLV $_3$ mg/m	PEL $_3$ mg/m	Supplemental Informa
Carbon steel wire		100	10*	10*	
Nominal composition:					
Total manganese ***	7439-96-5	<2.0	5	5(c)	
Total copper including plated coating ***	7440-50-8	<0.5	10*	10*	
Iron	7439-89-6	bal.	10*	10*	

* Not listed. Nuisance maximum is 10 mg. per meter.

*** Subject to the reporti requirements of Sectio 312, and 313 of the Em Planning and Community Right-to-Know Act of 1 and of 40CFR 370 and 3

(c) Ceiling value not to be exceeded at any time.

SECTION III - FIRE AND EXPLOSION HAZARD DATA

Non Flammable; Welding arc and sparks can ignite combustibles and flammable products. See Z49.1 referenced in Section VI.

Supersedes W3, 9/23/85

(CONTINUED ON SIDE TWO

ISG International Steel Group Incorporated

MATERIAL SAFETY DATA SHEET
Date Issued: March 2000

1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION INFORMATION

Product Name: Cold Rolled HSLA Sheet

Synonym(s): Cold Rolled HSLA Steel

International Steel Group Incorporated
3250 Interstate Drive
Richfield, Ohio 44286

2. COMPOSITION INFORMATION ON INGREDIENTS

COMPONENTS	CAS No.	Wt.%	OSHA PEL (mg/M³)	ACGIH TLV (mg/M³)	LD50 or LC50 Species/Route
Iron (Fe)	7439-89-6	>98	10 - Iron Oxide Fume	5 - Iron Oxide Fume as Fe	5.4 gm/kg mouse/oral
Aluminum (Al)	7429-90-5	0.01-0.1	10 - Total Dust 5 - Respirable Fraction	10 - Metal Dust as Al 5 - Fume as Al	No Information
Carbon (C)	7440-44-0	0.015-0.15	Not Established	Not Established	No Information
Chromium (Cr)*	7440-47-3	0-0.7	1-Chromium Metal as Cr 0.5 - Chromium (II, III) Compounds as Cr 0.1 - Chromates as CrO_3	0.5 - Chromium Metal 0.5 - Chromium (II, III) Compounds as Cr 0.05 - Chromium (VI) Compounds as Cr	No Information
Manganese (Mn)	7439-96-5	0.25-0.95	5 - Ceiling as Mn	5 - Dust as Mn 1 - Fume as Mn 3 - Fume as Mn (STEL)	9 gm/kg rat/oral
@Nickel (Ni)	7440-02-0	0-0.5	1 - Metal as Ni 1 - Insoluble Compounds as Ni 1 - Soluble Compounds as Ni	1 - Metal 1 - Insoluble Compounds as Ni 0.1 - Soluble Compounds as Ni	No Information
Silicon (Si)	7440-21-3	0.1 - 0.4	15 - Total Dust 5 - Respirable Fraction	10	No Information

Material may contain trace or residual elements. The following are typical percentages for the elements identified: boron 0.001%, copper 0.02%, molybdenum 0.006%, niobium (columbium) 0.05%, phosphorous 0.04%, sulfur 0.015%, tin 0.004%, titanium 0.06%, and vanadium 0.002%.

*The chromium contained in this product is in the elemental form.

@ SARA Reportable - See Section 15. Regulatory Information.

3. HAZARDS IDENTIFICATION

Potential Health Effects: Cold rolled HSLA steel products in their usual physical form do not pose a health hazard. Inhalation of metal dust and fume may result from further processing of the material by user, particularly during welding, burning, grinding, and machining activities, and should be evaluated by an industrial hygienist. Presented below are the potential health effects that have been identified for the ingredients listed which are of an industrial hygiene significance.

Chromium: Chromium metal and its divalent and trivalent compounds are of low toxicity. Adverse reactions on the skin may include dermatitis for a Cr-sensitive individual. Long-term excessive inhalation exposure to ferro-chromium alloys may cause lung changes in workers exposed to these alloys. Exposure to chromium metal does not give rise to pulmonary fibrosis or pneumoconiosis. Chromium metal, unlike hexavalent chromium (Chromium VI), has not been linked to an increased risk of cancer.

Iron Oxide: Long-term excessive inhalation exposure to iron oxide fume or dust has been associated with a benign lung condition known as siderosis. No physical impairment of lung function has been linked to siderosis.

Nickel: Nickel fume and dust are respiratory irritants and excessive exposure may cause severe inflammation of the lungs. Prolonged and repeated skin contact with nickel and its compounds may cause an allergic dermatitis. The resulting skin rash is often referred to as "nickel itch." Nickel and its compounds may also produce eye irritation, particularly on the inner surfaces of the eyelids. Studies have linked nickel and certain nickel compounds to an increased incidence of cancer of the respiratory system.

Usual Route(s) of Entry: Inhalation

Medical Conditions Possibly Aggravated: Individuals with chronic diseases or disorders of the respiratory system should consult a physician regarding workplace exposure to ingredients.

IARC NTP OSHA

Carcinogen References: Nickel Yes Yes No

4. FIRST AID MEASURES

Eye: Treat for foreign body in the eye. Seek medical attention.

Skin: Not anticipated to pose a significant skin hazard. However, should dermatitis develop, wash affected area thoroughly with mild soap and water. If irritation or other symptoms develop, seek medical attention.

Ingestion: Not considered an ingestion hazard.

Inhalation: Remove from excessive exposure levels. Seek medical attention. Give artificial respiration if breathing has stopped.

5. FIRE FIGHTING MEASURES

Steel products do not present fire or explosion hazards under normal conditions. Molten metal may react violently with water. High concentrations of metallic fines in the air may present an explosion hazard.

Fire fighters are to wear full protective equipment, including full bunker gear and SCBA respiratory protection.

6. ACCIDENTAL RELEASE MEASURES

Any excess product can be recycled for further use, disposed in an appropriately permitted waste landfill, or disposed by other methods which are in accordance with local, state, and federal regulations.

7. HANDLING AND STORAGE

Work Practices: Use lifting and work devices, e.g., crane, hoist, etc., within rated capacities and in accordance with manufacturer's instructions when handling these products.

Should be handled in ways to minimize generation of airborne dust and fume.

Nonmetallic coatings, i.e. oils, paints, epoxies, laminates, etc. may be applied (generally at the customer's request) to the surface of these products. Burning or welding on steel products with nonmetallic coatings may produce emissions which may cause eye and respiratory tract irritation or other respiratory system effects. The possible presence of these coatings should be recognized and considered when evaluating potential employee health hazards and exposures during handling and welding or other dust/fume generating activities. Typical nonmetallic coatings include severely hydrotreated light and heavy naphthenic oils. Prolonged contact with these oils may cause skin irritation and should be avoided.

8. EXPOSURE CONTROLS /PERSONAL PROTECTION

Engineering Controls (Ventilation, etc.): Provide ventilation sufficient to maintain exposure levels below the applicable exposure limits.

When airborne emissions may occur due to further processing: (1) avoid breathing dust and fume, (2) evaluate potential employee exposure, (3) minimize generation of airborne emissions, (4) maintain surfaces free as practical of accumulated material, (5) use protective clothing as specified by an industrial hygienist or safety professional where exposure levels may be excessive, (6) do not smoke in work area, (7) wash hands before eating, drinking or smoking and after handling, (8) change contaminated clothing before leaving work premises.

Removal of surface coatings should be considered prior to welding or other fume generating activities.

Eye Protection: Use safety glasses and/or other protective eyewear as specified by a safety professional where risk of eye injury is present.

Skin Protection: Not anticipated to pose significant skin hazard. Use gloves (i.e., cotton, leather or kevlar) and/or protective clothing (i.e., Tyvek, cotton) as specified by an industrial hygienist or safety professional where exposure levels are excessive or where handling material could result in punctures or cuts to the hands or arms.
Respiratory Protection: When engineering controls are not feasible or sufficient to lower exposure levels below the applicable exposure limit, use a NIOSH-approved respirator which protects against dust or fume as specified by an industrial hygienist or qualified safety professional in accordance with manufacturer instructions and use limitations.

9. PHYSICAL AND CHEMICAL PROPERTIES

Physical State: Solid
Specific Gravity: 7.6 to 7.8

Appearance and Odor: Metallic grey solid; no odor
Melting Point: 2800°F

10. STABILITY AND REACTIVITY

Chemical Stability: Stable
Conditions to Avoid: Acids
Hazardous Decomposition Products: Metal oxides of listed ingredients and carbon monoxide from nonmetallic coatings.
Hazardous Polymerization: Will not occur

11. TOXICOLOGICAL INFORMATION

See available LD50 and/or LC50 information in Section 2.

12. ECOLOGICAL INFORMATION

Steel products in their usual physical form do not pose an ecological hazard.

13. DISPOSAL CONSIDERATION

Any excess product can be recycled for further use, disposed in an appropriately permitted waste landfill, or disposed by other methods which are in accordance with local, state, and federal regulations.

14. TRANSPORT INFORMATION

Not a hazardous material for DOT shipping.

15. REGULATORY INFORMATION

SARA Title III Hazard Categories: This material is considered, under applicable definitions, to meet the following categories.

( ) Immediate (acute) Health
( ) Reactive
(x) Delayed (chronic) Health
( ) Fire
( ) Sudden Release of Pressure

SARA 313 Information: This product contains chemicals subject to the reporting requirements of Section 313 of TITLE III of the Superfund Amendments & Reauthorization Act (SARA) of 1986 and 40 CFR, Part 372 (see Section 2; the @ symbol denotes chemicals subject to these reporting requirements). Please also note that if you repackage or otherwise redistribute this product to industrial customers, SARA 313 requires that a notice be sent to those customers.

16. OTHER INFORMATION

The following label hazard ratings are recommended:

NFPA		HMIS	
Fire	0	Health	0
Health	0	Flammability	0
Reactivity	0	Reactivity	0
Specific Hazard	None		

Our objective in sending this information is to help you protect the health and safety of your personnel and to comply with the OSHA Hazard Communication Standard and Title III of the Superfund Amendment and Reauthorization Act of 1986. ISG MAKES NO WARRANTIES, EXPRESS OR IMPLIED, INCLUDING THE IMPLIED WARRANTY OF MERCHANTABILITY, ANY IMPLIED WARRANTY OF FITNESS FOR A PARTICULAR PURPOSE, AND ANY IMPLIED WARRANTIES OTHERWISE ARISING FROM COURSE OF DEALING OR TRADE.

COLD ROLLED HSLA SHEET

INTERNATIONAL STEEL GROUP INCORPORATED

Contains: Aluminum (CAS 7429-90-5), Carbon (CAS 7440-44-0), Chromium (CAS 7440-47-3), Iron (CAS 7439-89-6), Manganese (CAS 7439-96-5), Nickel (CAS 7440-02-0) and Silicon (CAS 7440-21-3)

CAUTION

Hazards: Inhalation of metal dust and fume may result from further processing of the material by the user, particularly during welding, burning, cutting, grinding and machining activities. Long-term excessive exposure to the fume or dust may cause respiratory system effects. Studies have associated nickel and certain nickel compounds to an increased risk of cancer of the respiratory system.

Recommended Handling Procedures:

- Avoid creating excessive dust or fume levels. Mechanical ventilation or personal protective equipment (i.e., eye protection, protective clothing and NIOSH-approved respiratory protection) may be necessary during welding, burning, grinding and other dust/fume generating activities.

- The presence of nonmetallic coatings (for example, oils, paints, epoxies, laminates, etc.) on these products should be considered when evaluating potential employee health hazards. Removal of surface coatings should be considered prior to welding or other dust/fume generating activities. Avoid prolonged skin contact with nonmetallic coating oils.

FIRST AID AND MEDICAL EMERGENCY PROCEDURES

Eye Contact: Treat for foreign body in the eye. Seek medical attention.

Skin Contact: Not anticipated to pose a significant skin hazard. However, should dermatitis develop, wash affected area with mild soap and warm water. Seek medical attention if conditions persist.

Inhalation: Remove from excessive exposure levels. Seek medical attention. Give artificial respiration if breathing has stopped.

Ingestion: Not considered an ingestion hazard.

March 2000

Miami Valley Steel

201 Fox Drive Piqua, Ohio 45356
937-773-7127 Fax: 937-773-1615

CERTIFICATION OF STEEL ANALYSIS

Sold To: Chase Manufacturing
PO Box 37
9 Pennsylvania Avenue
Corry, PA 16407-1603

Ship To: Chase Manufacturing
9 Pennsylvania Ave
Corry, PA 16407-1603

Bill of Lading: 334142 Date: 5/14/08 Order: 531919-1 Part:
PO#: 08117RC2 Rel: Size: 1/4GA X 3.7500" X Coil
Description: Hot Rolled Black HS

Tag #	Pkg #	Heat	Weight	Yield	Tensile	Elong
694536-P1A09		4180616	1950	63300.00	76900.00	32.00
760101		E70547-1	1302	53750.00	62960.00	37.00
760102		266045	3502	56000.00	73000.00	29.00
760547		0450270	2990	46200.00	69600.00	30.00
760548		450270	4574	48900.00	72300.00	31.50

Heat	C	Mn	P	S	Al	Si
4180616	0.060	0.870	0.010	0.003	0.039	0.070

Heat	C	Mn	P	S	Al	Si
E70547-1	0.070	1.070	0.014	0.016	0.041	0.066

3400 lbs 7/29/08

Timothy A. McNally

We hereby certify the above figures are accurately stated. Certification Records are retained for 5 years

Miami Valley Steel ISO9001:2000 Reg # 0020364

Jun 27, 2008

"Bryan Anderson \(Chase Manufacturing\)" <bryan.chasemfg@verizon.net>

10/29/2008 02:51 PM

To Abraham Reich/R3/USEPA/US@EPA

cc

bcc

Subject Sara Title III Section 313

Abraham Reich,

Here are my findings after going through all 3 years. They are on an Excel Spread Sheet. Any problems or questions let me know. The only thing I could find Was Manganese.

Bryan Anderson

Chase MFG

Corry Pa. Total Manganese.xls

Chase

2005

# Steel	Percent	Total Manganese
44060	1.135	500.08
44490	1.013	450.68
27900	1.094	305.23
53340	1.094	583.54
41030	1.112	583.54
50100	1.054	528.05
44770	1.087	486.65
40640	1.038	421.84
41410	1.115	461.72
36510	1.173	428.26
46560	1.186	552.2
53960	1.249	673.96

Weld Wire		
2650	2	53

Total 6028.75

2006

# Steel	Percent	Total Manganese
38880	1.32	513.22
45640	1.42	648.08
8430	1.03	86.83
40950	1.17	479.12
22325	1.09	243.34
44364	1.29	572.3
45360	1.24	562.46
45980	1.03	473.59
45980	1.11	510.38
36550	1.29	471.5
46530	1.08	502.52
25190	1.34	337.55
45680	1.31	598.4
48110	1.39	668.73

Weld Wire		
2150	2	43

Total 6711.02

2007

# Steel	Percent	Total Mang
43580	1.21	527.32
45215	1.09	492.84
47480	1.11	527.02
48700	1.26	620.26
43800	1.28	560.64
44634	1.07	477.58
47668	1.23	586.32
47970	1.15	551.65

Weld Wire		
4000	2	80

Total 4423.63